

EXHIBIT 15

From: [Wolfshohl, Joshua W.](#)
To: [Erin Jones](#); [Christopher Murray](#)
Cc: [Starling, Kenesha L.](#); [Stevens, Jordan T.](#)
Subject: FW: Emergency Request: Heslin v. Jones, D-1-GN-18-001835
Date: Friday, June 21, 2024 4:50:58 PM
Importance: High

Erin,

Josh

Joshua W. Wolfshohl | Partner
Porter Hedges LLP

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From: Federico Reynal <areynal@frlaw.us>
Sent: Friday, June 21, 2024 2:31 PM
To: Vickie Driver <vickie.driver@crowedunlevy.com>; Wolfshohl, Joshua W. <JWolfshohl@porterhedges.com>
Subject: Fwd: Emergency Request: Heslin v. Jones, D-1-GN-18-001835

FYI

F. Andino Reynal
The Reynal Law Firm LLP
917 Franklin, Sixth Floor
Houston, Texas 77002
O: 713.228.5900
F: 713.820.6981

----- Forwarded message -----

From: **345 Submission** <345.Submission@traviscountytexas.gov>
Date: Fri, Jun 21, 2024 at 2:27 PM
Subject: RE: Emergency Request: Heslin v. Jones, D-1-GN-18-001835
To: Mark Bankston <mark@fbtrial.com>, Elliott Beck <Elliott.Beck2@traviscountytexas.gov>
Cc: Chris Martin <martin@mdjlaw.com>, Federico Reynal <areynal@frlaw.us>, Bill Ogden <bill@fbtrial.com>, Moshenberg, Avi (External) <avi.moshenberg@lmbusinesslaw.com>

Counsel:

Your emergency request has been received and is under review.

Best,

Batool Fatima

Judicial Executive Assistant
345th Judicial District Court - The Honorable Jan Soifer
P.O. Box 1748
Austin, Texas 78767
(512) 854-9712

From: Mark Bankston <mark@fbtrial.com>

Sent: Friday, June 21, 2024 12:59 PM

To: 345 Submission <345.Submission@traviscountytx.gov>; 459 Submission
<459.Submission@traviscountytx.gov>

Cc: Chris Martin <martin@mdjwlaw.com>; Federico Reynal <areynal@frlaw.us>; Bill Ogden
<bill@fbtrial.com>; Moshenberg, Avi (External) <avi.moshenberg@lmbusinesslaw.com>; Shannon
Matusek-Steele <Shannon.Matusek-Steele@traviscountytx.gov>

Subject: [CAUTION EXTERNAL] Emergency Request: Heslin v. Jones, D-1-GN-18-001835

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Judge Soifer,

I am writing under Local 7.3 to request an emergency hearing on behalf of my clients Neil Heslin and Scarlett Lewis. As I'm sure you're aware, Mr. Heslin and Ms. Lewis were the plaintiffs in the 2022 trial against Alex Jones and Free Speech Systems, LLC held in the 459th District Court, resulting in a final judgment exceeding \$50 million. As you may also be aware, the case has been under a bankruptcy stay since the time judgment was entered.

Today, the U.S. Bankruptcy Court for the Southern District of Texas has dismissed the bankruptcy case of Free Speech Systems, which lifted the stay on collection actions against Free Speech Systems in state court. (Because Alex Jones is still in bankruptcy, a stay against Jones individually remains in place.)

Plaintiffs have now filed the attached Application for Turnover Order, along with the attached proposed order, seeking that FSS be ordered to turn over its property under the Texas turnover statute. Because of the immediate danger of displacement of assets, Plaintiffs are requesting an emergency remote hearing take place today on the motion. Counsel for Free Speech Systems has indicated he is available to appear at a remote hearing today. The hearing should take 15-20 minutes.

I have copied the 459th District Court, to which this case is specially assigned. We would be very grateful if either court could accommodate a remote hearing today.

Mark Bankston
Farrar & Ball, LLP

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